

Georgia Department of Natural Resources

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Lorice C. Barrett, Commissioner

Environmental Protection Division

Harold F. Rehels, Director

Office: 404/657-8831 FAX: 404-463-6676

May 6, 2002

Mr. Joe Dunlop
Program Coordinator
Georgia Department of Community Affairs
Officer of Environmental Management
60 Executive Park South, N.E.
Atlanta, Georgia 30329-2231

SUBJECT: Electronic Equipment Collection Events

Dear Mr. Dunlop:

Thank you for your correspondence dated July 27, 2001, concerning the handling of electronic equipment collected from households and small businesses. The Department of Community Affairs and the participating communities are commended for their efforts to reduce the amount of this equipment going for disposal. We sincerely apologize for whatever happened back in November that caused the letter not to reach you, as we thought it did.

Until specific rules concerning the recycling of electronic equipment are promulgated, we have taken the position that the equipment is not subject to regulation as waste, regardless of its origin, as long as the equipment is in commerce. In other words, the electronic equipment has value, a known market, and it is being legitimately reused or recycled in a beneficial manner.

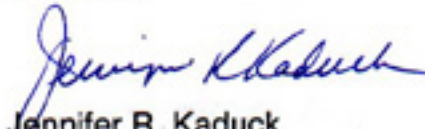
For the electronic equipment that must be discarded, you are correct in saying that the equipment collected from households and Conditionally Exempt Small Quantity Generators of hazardous waste may be disposed of in a permitted Municipal Solid Waste Landfill. We recommend you have the landfill owner's approval prior to disposal. The only equipment that should be accepted from Small Quantity Generators of hazardous waste is those pieces of equipment for which a legitimate reuse is already established or those pieces that have no hazardous components. Electronic equipment that may be hazardous waste

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should not be accepted for disposal from Small Quantity Generators of hazardous waste because they are required to manifest all of their hazardous waste to a RCRA permitted Treatment-Storage-Disposal facility.

Should you have any questions, please contact Jack Dempsey or Renée Hudson Goodley at (404) 657-8831. Your cooperation in protecting Georgia's environment is appreciated.

Sincerely,



Jennifer R. Kaduck
Chief

Hazardous Waste Management Branch

JRK/JND/gat

c: Renée Hudson Goodley
GCP Staff

File: Regulatory Interpretations

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